

EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

No. 0:18-cv-01776-JRT-HB

This Document Relates To: All Actions

**TYSON DEFENDANTS' DISCLOSURES PURSUANT TO
ORDER REGARDING DISCLOSURE OF INFORMATION**

Defendants Tyson Foods, Inc., Tyson Fresh Meats, Inc., and Tyson Prepared Foods, Inc. (collectively, “Tyson”), by their attorneys, Axinn, Veltrop & Harkrider LLP and Dykema Gossett PLLC, hereby provide the following disclosures to Direct Purchaser Plaintiffs, Individual Indirect Purchaser Plaintiffs, and Commercial and Institutional Indirect Plaintiffs (collectively, “Plaintiffs”) in the above-captioned proceedings in response to the Order Regarding Disclosure of Information (Dkt. 290) dated February 7, 2019 (“Order”). As indicated in the Order, these limited disclosures concern the period from January 1, 2007 to June 30, 2018 and are provided “to the extent such documents [and/or information] exist and are readily available” to Tyson at this time.

Tyson has not completed its investigation into the claims and/or defenses in this case. The limited disclosures contained herein are based on Tyson’s knowledge, information, and belief at this time. Although Tyson does not assume any duty to supplement these disclosures, Tyson reserves its right to amend and/or supplement these limited disclosures at any appropriate time if Tyson obtains additional or more accurate information and/or if it should appear at any time that there are omissions or errors in these early disclosures. Further, in making the disclosures pursuant to this order, Tyson makes no representations regarding whether it may use

any documents, people, or information listed herein in support of its claims or defenses in this matter and is not agreeing that the persons or sources of information disclosed possess information relevant to the claims or defenses.

Tyson makes these limited disclosures based on its understanding of the allegations set forth in Plaintiffs' Consolidated Class Action Complaints and its understanding of the information reasonably available to Tyson as of the present date. By making these disclosures, Tyson does not waive its right to object to discovery or admissibility of any information described herein on the basis of attorney-client privilege, work product protection, joint defense privilege, or any other applicable privilege, law, or rule. Nor does Tyson waive its right to assert any other objection authorized by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, or any other applicable law or rule in response to requests for the production of documents, interrogatories, requests for admission, deposition questions, or any other discovery requests involving or relating to the subject matter of these disclosures.

A. Organizational Charts (“sufficient to show the names and titles of individuals with the following positions or responsibilities relating to pork”)

Tyson’s Disclosure: Tyson does not maintain organization charts in the ordinary course of its business and, thus, such charts are not “readily available” to Tyson. As permitted by the terms of the Order, Tyson instead discloses below the requested information, to the extent it is readily available, in list format.

1. Members of the board of directors

Tyson’s Disclosure:

Members of the Board	Years Active Within Requested Period
Albert Zapanta	2007 - 2015
Barbara Tyson	2007 - 2018
Brad Sauer	2008 - 2017
Cheryl Miller	2016 - 2018
Dean Banks	2017 - 2018
Dick Bond	2007 - 2009

Members of the Board	Years Active Within Requested Period
Don Tyson	2007 - 2011
Donnie Smith	2014 - 2016
Gaurdie Banister, Jr.	2011 - 2018
Jeffrey Schomburger	2016 - 2018
Jim Kever	2007 - 2016
Joann Smith	2007 - 2010
John Tyson	2007 - 2018
Kathleen Bader	2011 - 2015
Kevin McNamara	2007 - 2018
Leland Tollett	2007 - 2008
Lloyd Hackley	2007 - 2011
Mike Beebe	2015 - 2018
Mikel Durham	2015 - 2018
Noel White	2018
Robert Thurber	2009 - 2018
Scott Ford	2007 - 2008
Tom Hayes	2016 - 2018

2. All executives with the title of Director, Vice President, or higher (such as SVP, CEO, COO, CFO, etc.), as well as their administrative assistants or secretaries

Tyson's Disclosure: In its regular course of business, Tyson does not maintain a historical list of each individual in each position beyond the predecessor of the current position holder. Thus, information for certain historical position-holders is not “readily available” to Tyson. Tyson discloses below information regarding positions as of June 30, 2018 based on its reasonable investigation to date. Tyson discloses executives with the title of Vice President or higher with executive responsibilities relating to Tyson’s pork business, as the title of Director is not an executive position within Tyson. While Tyson also does not maintain a historical list of each administrative assistant serving each position, Tyson discloses below information about administrative assistants to the extent the information is “readily available” to Tyson based on its reasonable investigation to date.

Name	Dates Active Within Requested Period		Position	Department	Admin. Assistant
Leah Andersen	4/29/2018	6/30/2018	VP Processor Sales	Processor Sales	
Roel Andriessen	1/1/2007	1/2/2017	SVP International	International Beef & Pork Export Sales	
Steve Billups	12/14/2014	6/30/2018	VP Fresh Meats Controller	Fresh Meats Controller	Denise Aritong

Name	Dates Active Within Requested Period		Position	Department	Admin. Assistant
Brad Bodine	11/1/2013	11/30/2013	VP National Account Sales	Functional Field Sales West	
	12/1/2013	6/30/2018	VP National Account Sales	Functional Field Sales East	
Richard Bond	1/1/2007	1/5/2009	President & CEO	President & CEO	
Jason Brester	2/4/2018	5/26/2018	VP Processor Sales	Processor Sales	
	5/27/2018	6/30/2018	VP Pork Procurement	Fresh Meats Hog Procurement	
Daniel Brooks	1/1/2007	10/9/2007	SVP Fresh Meats Operations	Dunes Fresh Meats Operations Beef / Pork	
	10/3/2010	6/29/2013	SVP Fresh Meats Operations	Fresh Meats Operations	
	6/30/2013	7/15/2015	SVP Hides & Tanneries	Fresh Meats Hides & Tanneries	
Paul Connor	2/4/2018	6/30/2018	VP Pork Production Planning	Pork Production Planning	
Keith Culver	1/1/2007	11/3/2007	VP National Account Sales	Dunes National Account Retail	
	11/4/2007	8/17/2013	VP National Account Sales	Functional Field Sales West	
	8/18/2013	5/2/2015	VP New Prod Production & Sales	New Product Production & Sales	
	5/3/2015	6/30/2018	VP Fresh Meats Sales	Fresh Meats Sales	
Jeremy Dickinson	12/7/2015	6/30/2018	VP Live Hogs	Pork Group	Amber James
Mark Gingerich	1/1/2007	12/31/2015	VP Fresh Meats Sales	Fresh Meats Sales	
Stewart Glendinning	12/11/2017	2/9/2018	EVP Finance & Accounting	Finance and Accounting	Ragan Melton
	2/10/2018	6/30/2018	EVP & Chief Financial Officer	Finance and Accounting	
Mark Gordon	3/30/2014	6/30/2018	VP Ops Case Ready	Case Ready Operations	
Kent Harrison	12/9/2010	6/30/2018	VP FM Mktg & Premium Programs	Fresh Meats Marketing & Premium Programs	
Thomas Hayes	10/1/2014	6/16/2015	President Food Service	Food Service	Karen Nagy
	6/17/2015	1/23/2016	Chief Commercial Officer & President FS	Food Service	

Name	Dates Active Within Requested Period		Position	Department	Admin. Assistant
	1/24/2016	6/12/2016	Chief Commercial Officer & President FS	Commercial	Karen Nagy
	6/13/2016	12/30/2016	President Tyson Foods	Tyson Foods President	
	12/31/2016	6/30/2018	President & CEO	President & CEO	
Nathan Hodne	2/4/2018	6/30/2018	SVP Case Ready	Case Ready	
Jerry Holbrook	1/1/2007	10/9/2007	SVP Fresh Sales/Mktg	Dunes Fresh Meats Sales & Marketing	
	10/10/2007	6/30/2018	SVP Fresh Sales/Mktg	Functional Field Sales	
Raymond Hollingsworth	1/1/2007	12/31/2013	VP Pork Production Planning/Inv Mgm	Fresh Meats Production Planning and Scheduling	
Lanny Johnk	9/22/2013	2/3/2018	VP Pork Production Planning	Pork Group Planning	
	2/4/2018	6/30/2018	VP Supply Chain	Fresh Meats Supply Chain	
Donnie King	8/29/2014	6/16/2015	President North Am. Ops & Food Svc	Domestic Operations & Food Service	
	6/17/2015	11/28/2015	Pres NA Ops Fresh Beef/Pork Pltry & PrFd	NA Ops Fresh Beef/Pork Pltry & PrFd	Debbie Rogers
	11/29/2015	2/15/2017	President NA Ops	NA Operations	
Jay Krehbiel	1/19/2014	2/3/2018	VP Pork Pricing	Fresh Meats Pricing	
	2/4/2018	6/30/2018	VP International Sales	International Beef & Pork Export Sales	
Dennis Leatherby	1/1/2007	6/4/2008	SVP Finance & Treasurer	Accounting/Finance & Risk Mgmt	
	6/5/2008	2/14/2017	EVF & Chief Financial Officer	Finance and Accounting	
	2/15/2017	12/11/2017	Chief Financial Officer	Finance and Accounting	
James Lochner	1/1/2007	10/20/2007	Senior Group VP Fresh Meats & Margin Optim	Fresh Meats & Margin Optim	
	10/21/2007	11/18/2009	Senior Group VP Fresh Meats	Fresh Meats & Margin Optim	
	11/19/2009	9/19/2014	Chief Operating Officer	Tyson Foods Operations	

Name	Dates Active Within Requested Period		Position	Department	Admin. Assistant
Gary Machan	1/1/2007	2/7/2010	VP Pork Procurement	Fresh Meats Hog Procurement	Stacey Murad
	2/8/2010	1/1/2014	SVP Pork Margin Management	Pork Margins	
Mona Melton	1/1/2007	11/30/2007	VP Fresh Meat Production	Dunes Fresh Meats Production	
Shane Miller	7/31/2009	5/25/2013	VP Pork Pricing	Fresh Meats Pricing	Jill Hansen; Mechelle Offerman
	5/26/2013	7/15/2015	SVP Pork Margin Management	Pork Margins	
	7/16/2015	2/3/2018	SVP Pork	Pork Margins	Jill Hansen
	2/4/2018	6/30/2018	SVP GM Value Added & Case Ready	Value Added & Case Ready	Jill Hansen; Sue Conway
Wade Miquelon	1/1/2007	6/16/2008	Chief Financial Officer	Finance and Accounting	
Todd Neff	1/1/2007	2/7/2010	VP Boxed Pork Pricing	Dunes Boxed Pork Pricing	
	2/8/2010	2/3/2018	VP Pork Procurement	Fresh Meats Hog Procurement	Mechelle Offerman
	2/4/2018	6/30/2018	SVP Pork	Pork Margins	
Todd Nogelmeier	8/1/2016	6/30/2018	VP Fresh Meat Food Services Sales	Fresh Meats Food Service Sales	
Jerry Pfeifer	1/1/2007	4/30/2015	VP Fresh Meats Controller	Dunes Fresh Meats Controller	
Charles Randall Chambers	10/7/2013	6/30/2018	VP Sourcing & Risk Management	Fresh Meats Commodity - Sourcing & Risk Management	
Jason Robertson	1/26/2007	9/29/2007	VP National Account Sales	Dunes National Account Retail	
	9/30/2007	2/26/2009	VP National Account Sales	Functional Field Sales East	
	2/27/2009	8/19/2012	VP Case Ready Beef & Pork	Case Ready Business Operations	
	8/20/2012	6/30/2018	VP Case Ready Beef & Pork	Business Operations	
Scott Rouse	1/1/2007	3/31/2007	SVP Retail Sales	Retail Sales	
	4/1/2007	9/13/2008	SVP Customer Development	Customer Development	
	9/14/2008	9/27/2014	SVP Customer Development	Customer Development Sales	

Name	Dates Active Within Requested Period		Position	Department	Admin. Assistant
	12/4/2017	6/30/2018	EVP & Chief Customer Officer	Customer	
Malik Sadiq	6/11/2007	12/1/2007	VP IS Manufacturing Systems	Operations	
	12/2/2007	6/30/2008	VP IS Manufacturing Systems	Manufacturing Applications	
	7/1/2008	5/31/2011	VP General Mgr - India	International India	
	11/1/2011	2/28/2014	VP Operations	International China	
	3/1/2014	10/31/2015	SVP Asia Pacific	International Asia Pacific	
	11/1/2015	9/2/2017	SVP Business Development	International Business Development	
	9/3/2017	6/30/2018	SVP International	International China	
James Schmitz	1/1/2007	10/9/2007	VP Fresh Meat Prod	Dunes Fresh Meats Production	Mechelle Offerman; Stacy Murad
	10/10/2007	6/30/2018	VP Pork Prod Operations	Pork Production Operations	
Robert Shuey	1/1/2007	11/8/2009	VP Int'l Sales	Dunes International Staff	
	11/9/2009	5/31/2016	VP Tanning Hides Margin Management	Tanning Hides Marginal Management	
	6/1/2016	10/8/2016	VP International Sales	International Sales Beef & Pork	
	10/9/2016	6/4/2017	VP International Sales	International Beef & Pork Export Sales	
	6/5/2017	6/30/2018	SVP International	International Beef & Pork Export	
Donnie Smith	11/19/2009	6/12/2016	President & CEO	President & CEO	
	6/13/2016	12/31/2016	CEO	Tyson Foods SLT	Brenda Kendrick
James Solsma	2/4/2018	6/30/2018	VP Pork Pricing	Fresh Meats Pricing	
Stephen Stouffer	7/31/2009	2/22/2012	VP Pricing Ground Beef, Trim & VM	Fresh Meats Pricing Trim & Ground Beef	
	10/27/2013	6/30/2018	President Fresh Meats	Fresh Meats	Aimee Hanson

Name	Dates Active Within Requested Period		Position	Department	Admin. Assistant
Glenn Strickholm	7/13/2008	8/9/2008	VP Fresh Meat Fd Svcs Sales	Dunes VP FM FD SVC Sales	
	8/10/2008	7/17/2016	VP Fresh Meat Fd Svcs Sales	Fresh Meats Food Service Sales	
	7/18/2016	2/3/2018	VP Food Service Sales	Accounts / Groups / CVP Sales	
	2/4/2018	6/30/2018	VP Intl Sales Value Added	International Sales Value-Added	
Leland Tollett	1/4/2009	11/18/2009	President & CEO	President & CEO	
John Thomas	1/1/2007	12/6/2015	VP Live Hogs	Pork Group	
Margarito Torrez	2/4/2018	6/30/2018	VP FM National Food Service Chain Accts	Fresh Meats National Food Service Chain Accounts	
Noel White	1/1/2007	10/9/2007	Group VP Fresh Meats Ops & Comm Sales	Beef / Pork Group	Roberta Gonzalez
	10/10/2007	12/3/2009	SVP Pork Margin Management	Pork Margins	
	12/4/2009	11/14/2013	Senior Group VP Fresh Meats	Fresh Meats & Margin Optimization	
	2/15/2017	8/1/2017	Chief Operations Officer	Tyson Foods Operations	
	8/2/2017	6/30/2018	Group President Fresh Meats & Intl	International	
Kevin Younger	4/26/2009	11/30/2013	VP National Account Sales	Functional Field Sales East	
	12/1/2013	6/30/2018	VP National Account Sales	Functional Field Sales West	

3. Investor and/or creditor relations

Tyson's Disclosure: In its regular course of business, Tyson does not maintain a historical list of each individual in each position beyond the predecessor of the current position holder. Thus, information for certain historical position-holders is not "readily available" to Tyson. Tyson discloses below information regarding investor and/or creditor relations positions as of June 30, 2018 based on its reasonable investigation to date.

Name	Dates Active Within Requested Period		Position	Department
Jon Kathol	10/10/2011	6/30/2018	VP Investor Relations & Asst Secretary	Investor Relations
Sandra Cartmell	1/1/2007	6/30/2018	Coordinator Shareholder Relations	Investor Relations

Name	Dates Active Within Requested Period		Position	Department
Julie Kegley	2/18/2007	7/14/2007	Manager Investor Communications	Investor Relations
	7/15/2007	12/10/2011	Dir. Financial Communication	Investor Relations
	12/11/2011	10/8/2016	Dir. Investor Relations	Investor Relations
	10/9/2016	6/30/2018	Associate Dir. Investor Relations	Investor Relations
Gary Mickelson	10/9/2016	6/30/2018	Sr Dir. Public Relations	Corporate Public Relations
Jennifer Davis	5/7/2018	6/30/2018	VP Corp Communications	Corporate Communications

4. a) Person(s) who have primary responsibility for managing or overseeing the reporting and transmitting of data directly to and from Agri Stats, Express Markets, Inc., Urner Barry, or USDA relating to pork pricing, supply, slaughter, inventory, export, or production levels

Tyson's Disclosure: Based on its reasonable investigation to date, Tyson is not aware of any employee with primary responsibility for managing or overseeing the reporting and transmitting of data directly to and/or from Express Markets or Urner Barry relating to pork pricing, supply, slaughter, inventory, export, or production levels.

With respect to transmission of data directly to and from Agri Stats, Tyson discloses as follows:

Name	Dates Active Within Requested Period		Position	Department
Deborah McConnell	1/1/2007	10/8/2016	Division Controller II	Dunes Fresh Meats Pork Accounting
	10/9/2016	12/31/2016	Controller II	Dunes Fresh Meats Pork Accounting
	1/1/2017	5/5/2018	Senior Controller	Dunes Fresh Meats Pork Accounting
	5/6/2018	6/30/2018	Assoc. Group Controller	Dunes Fresh Meats Pork Accounting

With respect to the transmission of data directly to and from USDA, Tyson discloses as follows:

Name	Dates Active Within Requested Period		Position	Department
Jerry Pfeifer	1/1/2007	4/30/2015	VP Fresh Meats Controller	Dunes Fresh Meats Controller
Steve Billups	12/14/2014	6/30/2018	VP Fresh Meats Controller	Dunes Fresh Meats Controller

4. b) Persons who regularly receive the Agri Stats report entitled the “Bottom Line Report”

Tyson’s Disclosure: Based on its reasonable investigation to date, Tyson discloses that it is not aware of any persons who receive an Agri Stats “Bottom Line Report” related to pork.

4. c) Person(s) who have primary responsibility for analyzing data received from Agri Stats to identify data pertaining to specific competitors

Tyson’s Disclosure: Based on its reasonable investigation to date, Tyson discloses that the following individual has primary responsibility for analyzing data received from Agri Stats.

Name	Dates Active Within Requested Period		Position	Department
Deborah McConnell	1/1/2007	10/8/2016	Division Controller II	Dunes Fresh Meats Pork Accounting
	10/9/2016	12/31/2016	Controller II	Dunes Fresh Meats Pork Accounting
	1/1/2017	5/5/2018	Senior Controller	Dunes Fresh Meats Pork Accounting
	5/6/2018	6/30/2018	Assoc. Group Controller	Dunes Fresh Meats Pork Accounting

4. d) Person(s) who receive any other survey of pork producers that concerns the profitability, supply, or pricing of pork products

Tyson’s Disclosure: Based on its reasonable investigation to date, Tyson is not aware of other surveys of pork producers that concern profitability, supply, or pricing of pork products.

5. Person(s) who supervise the department responsible for pork sales to, purchases from, trades with, or co-packing transactions with other pork producers

Tyson’s Disclosure: With respect to supervision of the department responsible for pork sales to other pork producers, Tyson discloses as follows:

Name	Dates Active Within Requested Period		Position	Department
John Thomas	1/1/2007	12/6/2015	VP Live Hogs	Pork Group
Jeremy Dickinson	12/7/2015	6/30/2018	VP Live Hogs	Pork Group

With respect to supervision of the department responsible for pork purchases from other pork producers, Tyson discloses as follows:

Name	Dates Active Within Requested Period		Position	Department
Gary Machan	1/1/2007	2/7/2010	VP Pork Procurement	Fresh Meats Hog Procurement
Todd Neff	2/8/2010	2/3/2018	VP Pork Procurement	Fresh Meats Hog Procurement
Jason Brester	5/27/2018	6/30/2018	VP Pork Procurement	Fresh Meats Hog Procurement

6. All executives with the title of Director, Vice President, or higher, as well as certain limited executives with the title of Manager, whose primary responsibilities include determining or setting pork pricing, supply, slaughter, inventory, export, or production levels, and who were an officer or board member of, or otherwise formally-designated participant (such as the member of a relevant committee) in any of the following: National Pork Board; National Pork Producers Council; National Pork Industry Conference; North American Meat Institute; American Meat Institute; American Meat Institute Foundation; Minnesota Pork Producers Association; North Carolina Pork Council; or South Carolina Pork Board.

Tyson's Disclosure: In its regular course of business, Tyson does not maintain records of each executive's current or historical formally-designated participation in trade associations, so such information is not "readily available" to Tyson. However, Tyson is aware of, and hereby discloses the following based on its reasonable investigation to date.

Name	Position	Trade Association	Years Active Within Requested Period
Todd Neff	SVP, Pork	Board, National Pork Producers Council	2007-2011
Shane Miller	SVP GM Value Added & Case Ready	USDA Wholesale Pork Reporting Negotiated Rulemaking Committee, appointed by National Meat Association (since merged to become part of North American Meat Institute)	2011
Thomas Hayes	President & CEO	President/Board, North American Meat Institute	2016-2018

7. All executives with the title of Director, Vice President, or higher, as well as certain limited executives with the title of Manager, whose primary responsibilities include determining or approving a Defendant's own pork pricing, supply, slaughter, inventory, export, or production levels.

Tyson's Disclosure: In its regular course of business, Tyson does not maintain a historical list of each individual in each position beyond the predecessor of the current position holder. Thus,

information for certain historical position-holders is not “readily available” to Tyson. Tyson discloses below information as of June 30, 2018 for executives with the title of Vice President or higher whose primary responsibilities include determining or approving a Defendant's own pork pricing, supply, slaughter, inventory, export, or production levels, as the title of “Director” and “Manager” are not executive positions within Tyson.

Name	Dates Active Within Requested Period		Position	Department
Jason Brester	5/27/2018	6/30/2018	VP Pork Procurement	Fresh Meats Hog Procurement
Paul Connor	2/4/2018	6/30/2018	VP Pork Production Planning	Pork Production Planning
Jeremy Dickinson	12/7/2015	6/30/2018	VP Live Hogs	Pork Group
Raymond Hollingsworth	1/1/2007	12/31/2013	VP Pork Production Planning/Inv Mgm	Fresh Meats Production Planning and Scheduling
Lanny Johnk	9/22/2013	2/3/2018	VP Pork Production Planning	Pork Group Planning
	2/4/2018	6/30/2018	VP Supply Chain	Fresh Meats Supply Chain
Jay Krehbiel	1/19/2014	2/3/2018	VP Pork Pricing	Fresh Meats Pricing
James Lochner	1/1/2007	10/20/2007	Senior Group VP Fresh Meats & Margin Optim	Fresh Meats & Margin Optim
	10/21/2007	11/18/2009	Senior Group VP Fresh Meats	Fresh Meats & Margin Optim
Gary Machan	1/1/2007	2/7/2010	VP Pork Procurement	Fresh Meats Hog Procurement
	2/8/2010	1/1/2014	SVP Pork Margin Management	Pork Margins
Shane Miller	7/31/2009	5/25/2013	VP Pork Pricing	Fresh Meats Pricing
	5/26/2013	7/15/2015	SVP Pork Margin Management	Pork Margins
	7/16/2015	2/3/2018	SVP Pork	Pork Margins
Todd Neff	1/1/2007	2/7/2010	VP Boxed Pork Pricing	Dunes Boxed Pork Pricing
	2/8/2010	2/3/2018	VP Pork Procurement	Fresh Meats Hog Procurement
	2/4/2018	6/30/2018	SVP Pork	Pork Margins
Charles Randall Chambers	10/7/2013	6/30/2018	VP Sourcing & Risk Management	Fresh Meats Commodity - Sourcing & Risk Management
James Schmitz	10/10/2007	6/30/2018	VP Pork Production	Pork Production Operations
James Solsma	2/4/2018	6/30/2018	VP Pork Pricing	Fresh Meats Pricing
Stephen Stouffer	10/27/2013	6/30/2018	President Fresh Meats	Fresh Meats

Name	Dates Active Within Requested Period		Position	Department
Noel White	1/1/2007	10/9/2007	Group VP Fresh Meats Ops & Comm Sales	Beef / Pork Group
	10/10/2007	12/3/2009	SVP Pork Margin Management	Pork Margins
	12/4/2009	11/14/2013	Senior Group VP Fresh Meats	Fresh Meats & Margin Optimization

B. Email Systems

Tyson's Disclosure:

Email System Used	Version Number	Dates Active
Microsoft Exchange	Exchange 2013	2015 - present
Microsoft Exchange	Exchange 2010	2011 - 2015
Microsoft Exchange	Exchange 2007	2008 - 2011
Microsoft Exchange	Exchange 2003	2005 - 2008

Email data for its employees is further stored in Tyson's implementation of Enterprise Vault which has been active since 2009.

C. Non-Custodial Data Sources

Tyson's Disclosure:

Unstructured Data Sources
<ul style="list-style-type: none"> • Email • Departmental Shares <ul style="list-style-type: none"> - Investor Relations - Pork Pricing - Pricing Files - Pork Projections - Agristats - Specs - Pork Futures • Departmental Laptops <ul style="list-style-type: none"> - Fresh Meats Accounting Shared Laptop • Sharepoints <ul style="list-style-type: none"> - Pork Dashboard - Accounting
Structured Data Sources
<ul style="list-style-type: none"> • CRM (Customer Relationship Management System)

- SAP (Invoice, Billing, Sales Orders, and Inventory Management)
- Data Warehouse
- Power BI
- Mainframe

D. Document Retention Policies

Tyson's Disclosure: Tyson has produced its document retention policies with Bates numbers TF-P-000000011 – TF-P-000000038.

E. Employee Technology Use Policies

Tyson's Disclosure: Tyson has produced its Employee Technology Use Policies with Bates numbers TF-P-000000039 – TF-P-000000127.

F. Inaccessible Data

Tyson's Disclosure: Tyson discloses that the following sources are not reasonably accessible: (1) deleted, slack, fragmented, corrupt or unallocated data, (2) residual data from internet or other online activities, including, but not limited to, temporary internet files, history, cache and cookies, (3) random access memory (RAM) or other ephemeral data that is difficult to preserve without disabling an operating system and server or system logs, (4) data maintained on disaster recovery tapes, back-up drives, or stored by other disaster proofing methods, and (5) data and databases for which applications no longer exist or are no longer maintained. Tyson further discloses that the forensic images of the mobile devices captured in the course of this case for Steve Billups, Jay Krehbiel and Stewart Glendinning are currently inaccessible due to forgotten passwords. Efforts to access the forensic images are ongoing, and intermediary steps to ensure the preservation of data on the mobile devices has occurred.

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Dated: March 8, 2019

By: /s/ David P. Graham
David P. Graham
DYKEMA GOSSETT PLLC
4000 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
(612) 486-1521
dgraham@dykema.com

Rachel J. Adcox (*pro hac vice*)
Tiffany Rider Rohrbaugh (*pro hac vice*)

AXINN, VELTROP & HARKRIDER LLP
950 F Street, N.W.
Washington, D.C. 20004
(202) 912-4700
radcox@axinn.com
trider@axinn.com

Counsel for Tyson Foods, Inc., Tyson Prepared Foods, Inc. and Tyson Fresh Meats, Inc.